

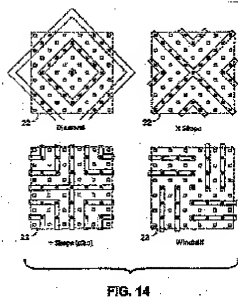
REMARKS

This application has been reviewed in light of the FINAL REJECTION mailed April 28, 2009. Reconsideration of this application in view of the below remarks is respectfully requested. Claims 1 – 11 are pending in the application with Claim 1 being in independent form.

I. Rejection of Claims 1, 2 and 4 – 11 Under 35 U.S.C. § 102(e)

Claims 1, 2 and 4 – 11 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,111,756 issued to Moresco.

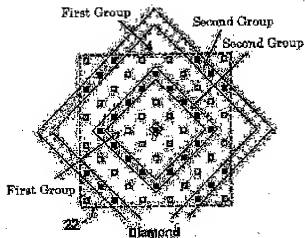
In the present Office action, Moresco, with reference to FIG. 14, is alleged to disclose Applicant's claimed arrangement of I/O cells. Specifically, the Office Action alleges that the blank dots (ground pads) in FIG. 14 correspond to the first group of I/O cells and that the filled dots correspond to the second group of I/O cells.



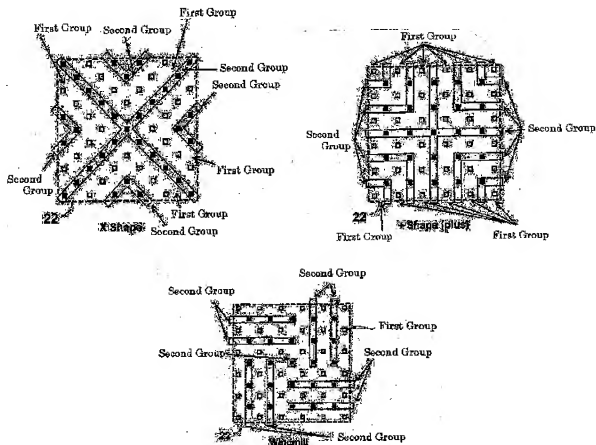
However, none of the various configurations depicted in FIG. 14 of Moresco disclose the arrangement of the first group of I/O cells and the second group of I/O cells which satisfy the claimed criteria of:

1. forming a first group of I/O cells and another portion of the I/O cells forming a second group of I/O cells disposed on an inner position of the mounting member with respect to the first group of I/O cells, i.e. the second group of I/O cells being surrounded by the first group of I/O cells;
2. the first group of I/O cells including a plurality of rows of interconnect pads disposed to encircle a center of the mounting member; and
3. the second group of I/O cells including a plurality of rows of interconnect pads disposed to encircle the center of the mounting member.

Turning to the "Diamond" configuration of FIG. 14 of Moresco, only criteria 2 and 3 are satisfied by the configuration. Specifically, the second group of I/O cells is not surrounded by the first group of I/O cells. Although the first and second groups of I/O cells include a plurality of rows of interconnect pads, the outer row of the second group of I/O cells surrounds the inner row of the first I/O cells.



Regarding the “X”, “+” and “Windmill” configurations depicted in FIG. 14, none of the criteria are satisfied.



Therefore, as demonstrated above, because Moresco does not disclose each and every element recited in the present claims, Applicant respectfully submits that the rejection has been obviated. Accordingly, Applicant respectfully requests withdrawal of the rejection with respect to Claims 1, 2 and 4 – 11 under 35 U.S.C. § 102(e).

II. Rejection of Claim 3 Under 35 U.S.C. § 103(a)

Claim 3 is rejected under 35 U.S.C. § 103(a) over Moresco in view of Applicant's admitted prior art (AAPA).

However, since Claim 3 depends from independent Claim 1, and thus includes all the features recited in that independent claim, Claim 3 is believed to be allowable over Moresco and AAPA, taken alone or in any proper combination.

Accordingly, Applicant respectfully requests withdrawal of the rejection with respect to Claim 3 under 35 U.S.C. § 103(a) over Moresco in view of AAPA.

CONCLUSIONS

In view of the foregoing remarks, it is respectfully submitted that all claims presently pending in the application, namely, Claims 1 – 11 are believed to be in condition for allowance and patentably distinguishable over the art of record.

If the Examiner should have any questions concerning this communication or feels that an interview would be helpful, the Examiner is requested to call Applicant's undersigned attorney at the number indicated below.

Respectfully submitted,



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